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IN THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE 2005 MAR 23 PM 2:44

IN RE:)
)
APPLICATION OF CHATTANOOGA)
GAS COMPANY, A DIVISION OF)
PIEDMONT NATURAL GAS COMPANY,)
INC., FOR AN ADJUSTMENT OF ITS)
RATES AND CHARGES, THE)
APPROVAL OF REVISED TARIFFS AND)
APPROVAL OF REVISED SERVICE)
REGULATIONS)
)

T.R.A. DOCKET ROOM

DOCKET NO. 04-00034

MOTION TO EXTEND TIME TO FILE RESPONSE

Comes the Consumer Advocate Division of the Office of the Attorney General (hereinafter "Consumer Advocate"), and hereby moves the Tennessee Regulatory Authority for an extension of time until March 30, 2005 in which to file its response to Chattanooga Gas's Pre-filed Testimony of Michael J. Morley in Support of Recon-2.

As grounds for this motion, the Consumer Advocate would state as follows:

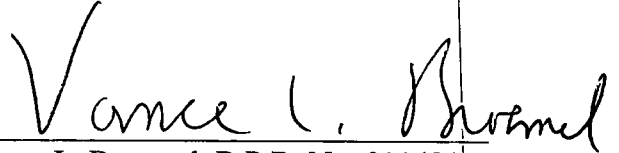
1. The time for the filing of the Consumer Advocate's response is currently Monday, March 28, 2005.
2. During the week of March 21-March 25, both Tim Phillips and Dan McCormac are out of the office on previously scheduled family vacations. Both these persons participated in the Chattanooga Gas hearing and are crucial to drafting the Consumer Advocate's response.
3. Dr. Steve Brown has been sick and did not come to the office on March 21-22. Given the fact that the Consumer Advocate's response must cover areas within Dr. Brown's area of financial and economic expertise, this has further delayed preparation.

4. Friday, March 25, 2005, is a state holiday, Good Friday, further hindering the Consumer Advocate's ability to prepare a response by Monday, March 28, 2005.

5. Counsel for the Consumer Advocate, Vance Broemel, has contacted counsel for Chattanooga Gas, Billye Sanders, and Chattanooga Gas does not oppose an extension of time until Wednesday, March 30 so long as the time for Chattanooga Gas's reply is extended by an equal amount of time.

WHEREFORE, the Consumer Advocate respectfully requests extension of two (2) days until March 30, 2005, in which to file its response, with an equal extension of time for Chattanooga Gas's reply.

Respectfully submitted,



Vance L. Broemel, B.P.R. No. 011421
Assistant Attorney General
Consumer Advocate and Protection Division
Box 20207
Nashville, Tennessee 37202-0207
(615) 741-8733

Dated: March 23, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Motion for Extension of Time to Response has been served via first-class U.S. Mail, postage prepaid, this 23rd day of March, 2005, upon:

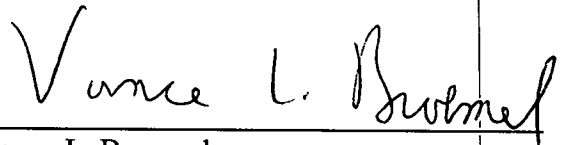
Dale Grimes
c/o Dale Grimes
Bass, Berry & Sims
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315 Deaderick Street, Suite 2700
Nashville, TN 37238-3001

Chattanooga Gas Company
c/o Archie Hickerson
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Vance L. Broemel
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